

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**IN RE  
MAHABUBUR RAHMAN  
Debtor**

**Case number 22-31106-KLP**

**Chapter 7**

**MOTION FOR ENTRY OF ORDER PERMITTING WITHDRAWAL OF COUNSEL**

CAME THIS DAY Ronald W. Stern, Movant, counsel for Debtor, and moves the Court to permit him to withdraw as counsel, and as grounds therefore states:

1. Irreconcilable differences and a conflict of interest exists in this case.
2. After reviewing the Debtor's answers to his questionnaire and preparation of the filing of this Petition, it appeared after the creditors hearings that the Debtor transferred businesses he had a property interest in without notifying counsel.
3. Even after the transfer of several businesses was discovered, Counsel attempted to co-operate with the Chapter 7 Trustee and United States Trustee to have this case administered, even though it was fairly clear that no discharge would be granted.
4. The Chapter 7 Trustee completed an exhaustive review of Debtor's documents that Counsel secured, and he made demands for additional documents and clarifications, which Counsel endeavored to supply. The Chapter 7 Trustee was extremely diligent in his efforts to administer the case and arranged for a Bengali interpreter to give Mr. Rahman every opportunity to explain the facts of his Petition.

5. The Debtor had been unable to provide complete disclosures required by the Chapter 7 Trustee, despite multiple demands from Counsel. Counsel has received information today that reveals a conflict of interest, such that he may be a witness.

6. Further representation of Mr. Rahman is not ethically possible.

7. It was recommended to Mr. Rahman that he seek new counsel.

8. Counsel will continue to provide any documents that are delivered by Mr. Rahman or his accountants to the Chapter 7 Trustee and the United States Trustee, but he will be unable to provide further legal services or advice to Mr. Rahman, given the circumstances.

9. Mr. Rahman's address is 5712 Francistown Road, Glen Allen, Virginia, 23060. His email address is [nrahman1020@gmail.com](mailto:nrahman1020@gmail.com). His phone number is 804-878-5586. With this information, the Chapter 7 Trustee and the Court will be able to keep Mr. Rahman information of the proceedings and hearings.

WHEREFORE, for the reasons stated above, Ronald W. Stern moves the Court to permit him to withdraw as counsel.

/s/ Ronald W. Stern

Ronald W. Stern

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